

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

United States of America

Plaintiff,

v.

Civil No. 13-1323-JDB

Seventy-Eight Thousand Six  
Hundred Sixty-Six Dollars (\$78,666.00)  
in United States Currency,

Defendant.

**PLAINTIFF'S RESPONSE TO COURT'S ORDER TO SHOW CAUSE**

COMES NOW the Plaintiff, United States of America, by and through Edward L. Stanton III, United States Attorney, and Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, and responds as follows to the Court's Show Cause Order:

1. A Verified Complaint of Forfeiture was filed in this case on December 9, 2013.
2. As the Court's Order notes, after service on all interested parties, no party has filed a claim.
3. This case is related to the criminal case of *United States v. Hassan Moustafa Safa, Mohamed Khalil, et al*, No. 13-10056. The United States has entered into a plea agreement with Mohamed Khalil in that case which also resolves the issues concerning forfeiture of the defendant property in this case. Sentencing is currently set for May 1, 2014.

4. Thus, while the United States expects to ultimately move to voluntarily dismiss this case as moot, it requests that the case remains active until such time as the defendant is sentenced and the forfeiture of the property becomes final.

Respectfully submitted,

EDWARD L. STANTON III  
United States Attorney

By: /s Christopher E. Cotten  
CHRISTOPHER E. COTTEN  
Assistant United States Attorney  
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(901) 544-4231  
No. 014277 (Tennessee)

**CERTIFICATE OF SERVICE**

I, Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, do hereby certify that a copy of the foregoing response has been sent, either first class postage pre-paid or via the Court's electronic filing system, to counsel for all known claimants.

This 25<sup>th</sup> day of February, 2014.

/s Christopher E. Cotten  
CHRISTOPHER E. COTTEN  
United States Attorney